

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney

MARTHA BOERSCH (CABN 126569)  
Chief, Criminal Division

DAN M. KARMEL (NYBN 5151485)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7007  
FAX: (415) 436-7234  
dan.karmel@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 24-00017 JST
	)	
Plaintiff,	)	STIPULATION TO CONTINUE STATUS
	)	CONFERENCE AND EXCLUDE TIME AND
v.	)	ORDER
	)	
JOEL DOWEN,	)	
	)	
Defendant.	)	

It is hereby stipulated by and between counsel for the United States and counsel for defendant Joel Downen that the status conference scheduled for January 24, 2024, be continued until January 29, 2024, and that time be excluded under the Speedy Trial Act from January 18, 2024, through January 29, 2024.

At the initial appearance held on January 18, 2024, counsel for the government stated that the government was moving for detention of the defendant, and the parties requested that the matter be scheduled for status on detention on January 24, 2024. Counsel for the government and counsel for the defendant have since been informed that the defendant may be retaining new counsel.

The parties therefore request that the status hearing scheduled for January 24, 2024, be continued until January 29, 2024, and agree that time should be excluded under the Speedy Trial Act from January

STIPULATION TO CONTINUE AND EXCLUDE TIME AND ORDER  
Case No. CR 24-00017 JST

1 18, 2024, until January 29, 2024, based on the government's pending motion for detention and the  
2 defendant's need for continuity of counsel. *See* 18 U.S.C. § 3161(h)(1)(d), (h)(7)(B)(iv). The parties  
3 further stipulate and agree that the ends of justice served by excluding the time from January 18, 2024,  
4 through January 29, 2024, from computation under the Speedy Trial Act outweigh the best interests of  
5 the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(7)(A), (h)(7)(B)(iv).

6 The undersigned Assistant United States Attorney certifies that he has obtained approval from  
7 counsel for the defendant to file this stipulation and proposed order.

8  
9 IT IS SO STIPULATED.

10 DATED: January 22, 2024

/s/  
\_\_\_\_\_  
DAN M. KARMEL  
Assistant United States Attorney

11  
12 DATED: January 22, 2024

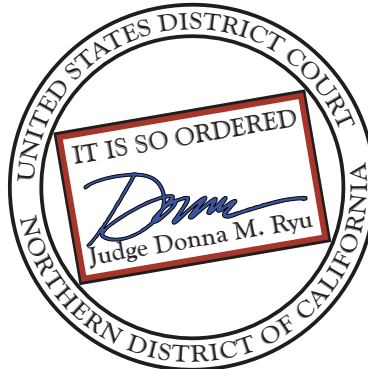
/s/  
\_\_\_\_\_  
JOHN PAUL REICHMUTH  
Counsel for Defendant JOEL DOWEN

**ORDER**

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on January 18, 2024, and for good cause shown, the Court finds that the government has a pending motion seeking pretrial detention of the defendant and that failing to exclude the time from January 18, 2024, through January 29, 2024, would unreasonably deny defendant continuity of counsel. *See* 18 U.S.C. § 3161(h)(1)(d), (h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from January 18, 2024, through January 29, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the status conference scheduled for January 24, 2024, is continued until January 29, 2024, and the time from January 18, 2024, through January 29, 2024, shall be excluded from computation under the Speedy Trial Act. *See* 18 U.S.C. § 3161(h)(1)(d), (h)(7)(A), (h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: January 23, 2024



HONORABLE DONNA M. RYU  
Chief Magistrate Judge, U.S. Magistrate Court